## Statement of Basis of the Federal Operating Permit

Lone Star Industries, Inc.

Site Name: Maryneal Cement Plant Physical Location: 202 County Road 306 Nearest City: Maryneal County: Nolan

> Permit Number: O1119 Project Type: Renewal

The North American Industry Classification System (NAICS) Code: 327310
NAICS Name: Cement Manufacturing

This Statement of Basis sets forth the legal and factual basis for the draft permit conditions in accordance with 30 TAC §122.201(a)(4). Per 30 TAC §§ 122.241 and 243, the permit holder has submitted an application under § 122.134 for permit renewal. This document may include the following information:

A description of the facility/area process description;

A basis for applying permit shields;

A list of the federal regulatory applicability determinations;

A table listing the determination of applicable requirements;

A list of the New Source Review Requirements;

The rationale for periodic monitoring methods selected;

The rationale for compliance assurance methods selected;

A compliance status; and

A list of available unit attribute forms.

Prepared on: April 10, 2018

# Operating Permit Basis of Determination

#### **Permit Area Process Description**

The raw material is mined on-site and transported to a limestone hopper. The limestone is passed through a series of crushers to achieve the desired size material for cement manufacturing. Additional raw material used in the process include a silica source (sand, ceramic scrap), an iron oxide source (mill scale, iron ore) and an alumina source (clay, fly ash) to create the desired mix before processing. The mix is passed through a series of separators to remove material that is the desired size and storing it in silos. Natural gas is used to heat the air for the raw mill separators to dry the raw material. Milled materials are pneumatically conveyed to the raw blend silos which feed bucket elevators that raise the material to feed silos for the processing kilns. The material is fed down through a pre-heater and contacted with hot exhaust gases from the kiln. The cement kiln is coal-fired. In the kiln, the material is physically transformed through calcination and clinkerization into cement clinker. The clinker is cooled and transferred to the clinker storage building. The clinker is then combined with gypsum and anhydrite to produce Portland cement and transported to cement storage silos. From the cement storage silos, the cement is loaded into railcars, trucks or packaged for sale.

#### **FOPs at Site**

The "application area" consists of the emission units and that portion of the site included in the application and this permit. Multiple FOPs may be issued to a site in accordance with 30 TAC § 122.201(e). When there is only one area for the site, then the application information and permit will include all units at the site. Additional FOPs that exist at the site, if any, are listed below.

Additional FOPs: None

#### **Major Source Pollutants**

The table below specifies the pollutants for which the site is a major source:

Major Pollutants	VOC, SO2, PM, NOX, HAPS, CO

#### Reading State of Texas's Federal Operating Permit

The Title V Federal Operating Permit (FOP) lists all state and federal air emission regulations and New Source Review (NSR) authorizations (collectively known as "applicable requirements") that apply at a particular site or permit area (in the event a site has multiple FOPs). **The FOP does not authorize new emissions or new construction activities.** The FOP begins with an introductory page which is common to all Title V permits. This page gives the details of the company, states the authority of the issuing agency, requires the company to operate in accordance with this permit and 30 Texas Administrative Code (TAC) Chapter 122, requires adherence with NSR requirements of 30 TAC Chapter 116, and finally indicates the permit number and the issuance date.

This is followed by the table of contents, which is generally composed of the following elements. Not all permits will have all of the elements.

- General Terms and Conditions
- Special Terms and Conditions
  - Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting
  - Additional Monitoring Requirements
  - o New Source Review Authorization Requirements
  - Compliance Requirements
  - o Protection of Stratosphere Ozone
  - Permit Location
  - Permit Shield (30 TAC § 122.148)
- Attachments

- Applicable Requirements Summary
  - Unit Summary
  - Applicable Requirements Summary
- Additional Monitoring Requirements
- o Permit Shield
- New Source Review Authorization References
- o Compliance Plan
- Alternative Requirements
- Appendix A
  - Acronym list
- Appendix B
  - Copies of major NSR authorizations

#### General Terms and Conditions

The General Terms and Conditions are the same and appear in all permits. The first paragraph lists the specific citations for 30 TAC Chapter 122 requirements that apply to all Title V permit holders. The second paragraph describes the requirements for record retention. The third paragraph provides details for voiding the permit, if applicable. The fourth paragraph states that the permit holder shall comply with the requirements of 30 TAC Chapter 116 by obtaining a New Source Review authorization prior to new construction or modification of emission units located in the area covered by this permit. The fifth paragraph provides details on submission of reports required by the permit.

#### Special Terms and Conditions

Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting. The TCEQ has designated certain applicable requirements as site-wide requirements. A site-wide requirement is a requirement that applies uniformly to all the units or activities at the site. Units with only site-wide requirements are addressed on Form OP-REQ1 and are not required to be listed separately on a OP-UA Form or Form OP-SUM. Form OP-SUM must list all units addressed in the application and provide identifying information, applicable OP-UA Forms, and preconstruction authorizations. The various OP-UA Forms provide the characteristics of each unit from which applicable requirements are established. Some exceptions exist as a few units may have both site-wide requirements and unit specific requirements.

Other conditions. The other entries under special terms and conditions are in general terms referring to compliance with the more detailed data listed in the attachments.

#### Attachments

Applicable Requirements Summary. The first attachment, the Applicable Requirements Summary, has two tables, addressing unit specific requirements. The first table, the Unit Summary, includes a list of units with applicable requirements, the unit type, the applicable regulation, and the requirement driver. The intent of the requirement driver is to inform the reader that a given unit may have several different operating scenarios and the differences between those operating scenarios.

The applicable requirements summary table provides the detailed citations of the rules that apply to the various units. For each unit and operating scenario, there is an added modifier called the "index number," detailed citations specifying monitoring and testing requirements, recordkeeping requirements, and reporting requirements. The data for this table are based on data supplied by the applicant on the OP-SUM and various OP-UA forms.

Additional Monitoring Requirement. The next attachment includes additional monitoring the applicant must perform to ensure compliance with the applicable standard. Compliance assurance monitoring (CAM) is often required to provide a reasonable assurance of compliance with applicable emission limitations/standards for large emission units that use control devices to achieve compliance with applicant requirements. When necessary, periodic monitoring (PM) requirements are specified for certain parameters (i.e. feed rates, flow rates, temperature, fuel type and consumption, etc.) to determine if a term and condition or emission unit is operating within specified limits to control emissions. These additional monitoring approaches may be required for two reasons. First, the applicable rules do not adequately specify monitoring requirements (exception- Maximum Achievable Control Technology Standards (MACTs) generally have sufficient monitoring), and second, monitoring may be required to fill gaps in the monitoring requirements of certain

applicable requirements. In situations where the NSR permit is the applicable requirement requiring extra monitoring for a specific emission unit, the preferred solution is to have the monitoring requirements in the NSR permit updated so that all NSR requirements are consolidated in the NSR permit.

Permit Shield. A permit may or may not have a permit shield, depending on whether an applicant has applied for, and justified the granting of, a permit shield. A permit shield is a special condition included in the permit document stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirement(s) or specified applicable state-only requirement(s).

New Source Review Authorization References. All activities which are related to emissions in the state of Texas must have a NSR authorization prior to beginning construction. This section lists all units in the permit and the NSR authorization that allowed the unit to be constructed or modified. Units that do not have unit specific applicable requirements other than the NSR authorization do not need to be listed in this attachment. While NSR permits are not physically a part of the Title V permit, they are legally incorporated into the Title V permit by reference. Those NSR permits whose emissions exceed certain PSD/NA thresholds must also undergo a Federal review of federally regulated pollutants in addition to review for state regulated pollutants.

Compliance Plan. A permit may have a compliance schedule attachment for listing corrective actions plans for any emission unit that is out of compliance with an applicable requirement.

Alternative Requirements. This attachment will list any alternative monitoring plans or alternative means of compliance for applicable requirements that have been approved by the EPA Administrator and/or the TCEQ Executive Director.

#### Appendix A

Acronym list. This attachment lists the common acronyms used when discussing the FOPs.

#### Appendix B

Copies of major NSR authorizations applicable to the units covered by this permit have been included in this Appendix, to ensure that all interested persons can access those authorizations.

#### Stationary Vents subject to 30 TAC Chapter 111

All stationary vents subject to 30 TAC Chapter 111 are listed in the permit's Applicable Requirement Summary. The basis for the applicability determinations for these vents, are listed in the Determination of Applicable Requirements table.

#### **Federal Regulatory Applicability Determinations**

The following chart summarizes the applicability of the principal air pollution regulatory programs to the permit area:

Regulatory Program	Applicability (Yes/No)
Prevention of Significant Deterioration (PSD)	Yes
Nonattainment New Source Review (NNSR)	No
Minor NSR	Yes
40 CFR Part 60 - New Source Performance Standards	Yes
40 CFR Part 61 - National Emission Standards for Hazardous Air Pollutants (NESHAPs)	No

Regulatory Program	Applicability (Yes/No)
40 CFR Part 63 - NESHAPs for Source Categories	Yes
Title IV (Acid Rain) of the Clean Air Act (CAA)	No
Title V (Federal Operating Permits) of the CAA	Yes
Title VI (Stratospheric Ozone Protection) of the CAA	Yes
CSAPR (Cross-State Air Pollution Rule)	No

#### **Basis for Applying Permit Shields**

An operating permit applicant has the opportunity to specifically request a permit shield to document that specific applicable requirements do not apply to emission units in the permit. A permit shield is a special condition stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirements or specified potentially applicable state-only requirements. A permit shield has been requested in the application for specific emission units. For the permit shield requests that have been approved, the basis of determination for regulations that the owner/operator need not comply with are located in the "Permit Shield" attachment of the permit.

#### **Insignificant Activities**

In general, units not meeting the criteria for inclusion on either Form OP-SUM or Form OP-REQ1 are not required to be addressed in the operating permit application. Examples of these types of units include, but are not limited to, the following:

- 1. Office activities such as photocopying, blueprint copying, and photographic processes.
- 2. Sanitary sewage collection and treatment facilities other than those used to incinerate wastewater treatment plant sludge. Stacks or vents for sanitary sewer plumbing traps are also included.
- 3. Food preparation facilities including, but not limited to, restaurants and cafeterias used for preparing food or beverages primarily for consumption on the premises.
- 4. Outdoor barbecue pits, campfires, and fireplaces.
- 5. Laundry dryers, extractors, and tumblers processing bedding, clothing, or other fabric items generated primarily at the premises. This does not include emissions from dry cleaning systems using perchloroethylene or petroleum solvents.
- 6. Facilities storing only dry, sweet natural gas, including natural gas pressure regulator vents.
- 7. Any air separation or other industrial gas production, storage, or packaging facility. Industrial gases, for purposes of this list, include only oxygen, nitrogen, helium, neon, argon, krypton, and xenon.
- 8. Storage and handling of sealed portable containers, cylinders, or sealed drums.
- 9. Vehicle exhaust from maintenance or repair shops.
- 10. Storage and use of non-VOC products or equipment for maintaining motor vehicles operated at the site (including but not limited to, antifreeze and fuel additives).
- 11. Air contaminant detectors and recorders, combustion controllers and shut-off devices, product analyzers, laboratory analyzers, continuous emissions monitors, other analyzers and monitors, and emissions associated with sampling activities. Exception to this category includes sampling activities that are deemed fugitive emissions and under a regulatory leak detection and repair program.
- 12. Bench scale laboratory equipment and laboratory equipment used exclusively for chemical and physical analysis, including but not limited to, assorted vacuum producing devices and laboratory fume hoods.
- 13. Steam vents, steam leaks, and steam safety relief valves, provided the steam (or boiler feedwater) has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
- 14. Storage of water that has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.

- 15. Well cellars.
- 16. Fire or emergency response equipment and training, including but not limited to, use of fire control equipment including equipment testing and training, and open burning of materials or fuels associated with firefighting training.
- 17. Crucible or pot furnaces with a brim full capacity of less than 450 cubic inches of any molten metal.
- 18. Equipment used exclusively for the melting or application of wax.
- 19. All closed tumblers used for the cleaning or deburring of metal products without abrasive blasting, and all open tumblers with a batch capacity of 1,000 lbs. or less.
- 20. Shell core and shell mold manufacturing machines.
- 21. Sand or investment molds with a capacity of 100 lbs. or less used for the casting of metals;
- 22. Equipment used for inspection of metal products.
- 23. Equipment used exclusively for rolling, forging, pressing, drawing, spinning, or extruding either hot or cold metals by some mechanical means.
- 24. Instrument systems utilizing air, natural gas, nitrogen, oxygen, carbon dioxide, helium, neon, argon, krypton, and xenon.
- 25. Battery recharging areas.
- 26. Brazing, soldering, or welding equipment.

#### **Determination of Applicable Requirements**

The tables below include the applicability determinations for the emission units, the index number(s) where applicable, and all relevant unit attribute information used to form the basis of the applicability determination. The unit attribute information is a description of the physical properties of an emission unit which is used to determine the requirements to which the permit holder must comply. For more information about the descriptions of the unit attributes specific Unit Attribute Forms may be viewed at <a href="https://www.tceq.texas.gov/permitting/air/nav/air\_all\_ua\_forms.html">www.tceq.texas.gov/permitting/air/nav/air\_all\_ua\_forms.html</a>.

A list of unit attribute forms is included at the end of this document. Some examples of unit attributes include construction date; product stored in a tank; boiler fuel type; etc.. Generally, multiple attributes are needed to determine the requirements for a given emission unit and index number. The table below lists these attributes in the column entitled "Basis of Determination." Attributes that demonstrate that an applicable requirement applies will be the factual basis for the specific citations in an applicable requirement that apply to a unit for that index number. The TCEQ Air Permits Division has developed flowcharts for determining applicability of state and federal regulations based on the unit attribute information in a Decision Support System (DSS). These flowcharts can be accessed via the internet at <a href="https://www.tceq.texas.gov/permitting/air/nav/air\_supportsys.html">www.tceq.texas.gov/permitting/air/nav/air\_supportsys.html</a>. The Air Permits Division staff may also be contacted for assistance at (512) 239-1250.

The attributes for each unit and corresponding index number provide the basis for determining the specific legal citations in an applicable requirement that apply, including emission limitations or standards, monitoring, recordkeeping, and reporting. The rules were found to apply or not apply by using the unit attributes as answers to decision questions found in the flowcharts of the DSS. Some additional attributes indicate which legal citations of a rule apply. The legal citations that apply to each emission unit may be found in the Applicable Requirements Summary table of the draft permit. There may be some entries or rows of units and rules not found in the permit, or if the permit contains a permit shield, repeated in the permit shield area. These are sets of attributes that describe negative applicability, or; in other words, the reason why a potentially applicable requirement does not apply.

If applicability determinations have been made which differ from the available flowcharts, an explanation of the decisions involved in the applicability determination is specified in the column "Changes and Exceptions to RRT." If there were no exceptions to the DSS, then this column has been removed.

The draft permit includes all emission limitations or standards, monitoring, recordkeeping and reporting required by each applicable requirement. If an applicable requirement does not require monitoring, recordkeeping, or reporting, the word "None" will appear in the Applicable Requirements Summary table. If additional periodic monitoring is required for an applicable requirement, it will be explained in detail in the portion of this document entitled "Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected."

When attributes demonstrate that a unit is not subject to an applicable requirement, the applicant may request a permit shield for those items. The portion of this document entitled "Basis for Applying Permit Shields" specifies which units, if any, have a permit shield.

#### Operational Flexibility

When an emission unit has multiple operating scenarios, it will have a different index number associated with each operating condition. This means that units are permitted to operate under multiple operating conditions. The applicable requirements for each operating condition are determined by a unique set of unit attributes. For example, a tank may store two different products at different points in time. The tank may, therefore, need to comply with two distinct sets of requirements, depending on the product that is stored. Both sets of requirements are included in the permit, so that the permit holder may store either product in the tank.

### **Determination of Applicable Requirements**

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
GRPVFTKB	40 CFR Part 60, Subpart Kb	60Kb	Product Stored = Petroleum liquid (other than petroleum or condensate) Storage Capacity = Capacity is less than 10,600 gallons (40,000 liters)	
L-49	40 CFR Part 60, Subpart K	60K	Construction/Modification Date = After June 11, 1973 And on or before March 8, 1974 Storage Capacity = Capacity is 40,000 gallons (151,416 liters) or less Product Stored = Stored product other than petroleum liquid (as defined in 40 CFR Part 60, Subpart K)	
G-26	40 CFR Part 60, Subpart Y	60Y3	Affected Facility = Mechanical Vent.  Construction/Reconstruction/Modification Date = Constructed after April 28, 2008.  Control Device Type = Emissions are controlled by control equipment other than a wet scrubber.  PM Emission Rate = The facility is subject to the requirements of §60.255(b)(1).	
G-27	40 CFR Part 60, Subpart Y	60Y3	Affected Facility = Mechanical Vent.  Construction/Reconstruction/Modification Date = Constructed after April 28, 2008.  Control Device Type = Emissions are controlled by control equipment other than a wet scrubber.  PM Emission Rate = The facility is subject to the requirements of §60.255(b)(1).	
G-28	40 CFR Part 60, Subpart Y	60Y3	Affected Facility = Mechanical Vent.  Construction/Reconstruction/Modification Date = Constructed after April 28, 2008.  Control Device Type = Emissions are controlled by control equipment other than a wet scrubber.  PM Emission Rate = The facility is subject to the requirements of §60.255(b)(1).	
GRPCOAL 1	40 CFR Part 60, Subpart Y	60Y1	Affected Facility = Coal processing and conveying equipment (including breakers and crushers), coal storage  Construction/Reconstruction/Modification Date = After October 24, 1974 and before April 28, 2008.  Compliance Option = Affected facility is complying with §60.255(b)(2).  Digital Opacity = The affected facility is not using a monitoring plan for a digital opacity compliance system.	
GRPCOAL 2	40 CFR Part 60, Subpart Y	60Y2	Affected Facility = Mechanical Vent.  Construction/Reconstruction/Modification Date = After October 24, 1974 and before April 28, 2008.  Compliance Option = Affected facility is complying with §60.255(b)(2).	
GRPCOALNEW	40 CFR Part 60, Subpart Y	60Y4	Affected Facility = Coal processing and conveying equipment (including breakers and crushers), coal storage  Construction/Reconstruction/Modification Date = Constructed after April 28, 2008.  Control Device Type = Emissions are controlled by control equipment other than a wet scrubber.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Compliance Option = Affected facility is complying with §60.255(b)(2).	
			Digital Opacity = The affected facility is not using a monitoring plan for a digital opacity compliance system.	
A-26	40 CFR Part 60,	60000	Prior To = The affected facility is prior to the first storage bin or silo.	
	Subpart OOO		Capture System = The affected facility is using a capture system for emissions control.	
			Underground Mines = The facility is not located in an underground mine.	
			Control Device Type = Control device other than a baghouse controlling emissions from only an individual enclosed storage bin or wet scrubber, or no emissions control.	
			Subpart Applicability = The facility is not subject to 40 CFR Part 60, Subparts F or I, nor does the facility follow, in the plant process, another facility subject to Subparts F or I.	
			Facility Type = Crusher.	
			Construction/Modification Date = After August 31, 1983.	
			Truck Dump = A truck dumps nonmetallic minerals into the affected facility.	
			Emissions Interference Type = No emissions interference occurs for the affected facility.	
			Replacement Type = Affected facility is of larger size, or is of equal or smaller size but has a different function than the facility it replaced and is not part of a production line with all affected facilities within the line replaced after August 31, 1983.	
A-27	40 CFR Part 60,		Prior To = The affected facility is prior to the first storage bin or silo.	
	Subpart OOO		Capture System = The affected facility is using a capture system for emissions control.	
		Control Device Type = Control device other than a baghouse corenclosed storage bin or wet scrubber, or no emissions control.  Subpart Applicability = The facility is not subject to 40 CFR Part 6	Underground Mines = The facility is not located in an underground mine.	
			Control Device Type = Control device other than a baghouse controlling emissions from only an individual enclosed storage bin or wet scrubber, or no emissions control.	
			Subpart Applicability = The facility is not subject to 40 CFR Part 60, Subparts F or I, nor does the facility follow, in the plant process, another facility subject to Subparts F or I.	
			Facility Type = Screening operation not processing saturated material.	
			Construction/Modification Date = After August 31, 1983.	
			Truck Dump = No truck dumps nonmetallic minerals into the affected facility.	
			Emissions Interference Type = No emissions interference occurs for the affected facility.	
			Replacement Type = Affected facility is of larger size, or is of equal or smaller size but has a different function than the facility it replaced and is not part of a production line with all affected facilities within the line replaced after August 31, 1983.	
GRPALTFUEL	40 CFR Part 60,	60F	Construction/Modification Date = After June 16, 2008.	
	Subpart F		BLDS = A bag leak detection system is not being used.	
			Facility Type = Raw material storage.	
			Opacity Title 40 Affected Subpart = The affected source subject to this subpart has a different emission limit or requirement for opacity under another regulation in Title 40 of this chapter.	
			Opacity Stringent Limit = NSPS F is the most stringent limit or requirement for opacity.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			EPA Alternative Requirements = Alternative monitoring requirements are not approved by the EPA administrator.	
GRPALTFUEL	40 CFR Part 63, Subpart LLL	63LLL	Major Source = The affected source is located at Portland cement plant that is a major source as defined in 40 CFR § 63.2.  Alternate Opacity Monitoring = No application has been submitted or approval has not been received for alternate monitoring requirements to demonstrate compliance with the opacity emission standards.  Facility Type = Raw material storage bin, clinker storage bin, finished product storage bin, conveying system transfer point, bagging system, bulk loading system, or bulk unloading system.	The rule citations were determined from an analysis of the rule text and the basis of determination
GRPBAG	40 CFR Part 60, Subpart F	60F	Construction/Modification Date = After June 16, 2008.  BLDS = A bag leak detection system is not being used.  Facility Type = Bagging system.  Opacity Title 40 Affected Subpart = The affected source subject to this subpart has a different emission limit or requirement for opacity under another regulation in Title 40 of this chapter.  Opacity Stringent Limit = NSPS F is the most stringent limit or requirement for opacity.  EPA Alternative Requirements = Alternative monitoring requirements are not approved by the EPA administrator.	
GRPBAG	40 CFR Part 63, Subpart LLL	63LLL	Major Source = The affected source is located at Portland cement plant that is a major source as defined in 40 CFR § 63.2.  Alternate Opacity Monitoring = No application has been submitted or approval has not been received for alternate monitoring requirements to demonstrate compliance with the opacity emission standards.  Facility Type = Raw material storage bin, clinker storage bin, finished product storage bin, conveying system transfer point, bagging system, bulk loading system, or bulk unloading system.	The rule citations were determined from an analysis of the rule text and the basis of determination
GRPCARBONB	40 CFR Part 60, Subpart F	60F	Construction/Modification Date = After June 16, 2008.  BLDS = A bag leak detection system is not being used.  Facility Type = Raw material storage.  Opacity Title 40 Affected Subpart = The affected source subject to this subpart has a different emission limit or requirement for opacity under another regulation in Title 40 of this chapter.  Opacity Stringent Limit = NSPS F is the most stringent limit or requirement for opacity.  EPA Alternative Requirements = Alternative monitoring requirements are not approved by the EPA administrator.	
GRPCARBONB	40 CFR Part 63, Subpart LLL	63LLL	Major Source = The affected source is located at Portland cement plant that is a major source as defined in 40 CFR § 63.2.  Alternate Opacity Monitoring = No application has been submitted or approval has not been received for alternate monitoring requirements to demonstrate compliance with the opacity emission standards.  Facility Type = Raw material storage bin, clinker storage bin, finished product storage bin, conveying system transfer point, bagging system, bulk loading system, or bulk unloading system.	The rule citations were determined from an analysis of the rule text and the basis of determination

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
GRPCLINK	40 CFR Part 60, Subpart F	60F	Construction/Modification Date = After June 16, 2008.  BLDS = A bag leak detection system is not being used.  Facility Type = Conveyor transfer points.  Opacity Title 40 Affected Subpart = The affected source subject to this subpart has a different emission limit or requirement for opacity under another regulation in Title 40 of this chapter.  Opacity Stringent Limit = NSPS F is the most stringent limit or requirement for opacity.  EPA Alternative Requirements = Alternative monitoring requirements are not approved by the EPA administrator.	
GRPCLINK	40 CFR Part 63, Subpart LLL	63LLL	Major Source = The affected source is located at Portland cement plant that is a major source as defined in 40 CFR § 63.2.  Alternate Opacity Monitoring = No application has been submitted or approval has not been received for alternate monitoring requirements to demonstrate compliance with the opacity emission standards.  Facility Type = Raw material storage bin, clinker storage bin, finished product storage bin, conveying system transfer point, bagging system, bulk loading system, or bulk unloading system.	The rule citations were determined from an analysis of the rule text and the basis of determination
GRPCOALML	40 CFR Part 63, Subpart LLL	63LLL	Major Source = The affected source is located at Portland cement plant that is a major source as defined in 40 CFR § 63.2.  Alternate Opacity Monitoring = No application has been submitted or approval has not been received for alternate monitoring requirements to demonstrate compliance with the opacity emission standards.  Facility Type = Raw material storage bin, clinker storage bin, finished product storage bin, conveying system transfer point, bagging system, bulk loading system, or bulk unloading system.	The rule citations were determined from an analysis of the rule text and the basis of determination
GRPCOOLER	40 CFR Part 60, Subpart F	60F	Construction/Modification Date = After June 16, 2008.  BLDS = A bag leak detection system is not being used.  Facility Type = Clinker cooler.  PM Title 40 Affected Subpart = The affected source subject to this subpart has a different emission limit or requirement for PM under another regulation in Title 40 of this chapter.  PM Stringent Limit = NSPS F is not the most stringent limit or requirement for PM.	
GRPCOOLER	40 CFR Part 63, Subpart LLL	63LLL	Major Source = The affected source is located at Portland cement plant that is a major source as defined in 40 CFR § 63.2.  Facility Type = Clinker cooler  Monovent = The unit has a control device that does not exhaust through a monovent.  COM Feasibility = The use of a continuous opacity monitor (COM), in accordance with the installation specifications of Performance Specification 1 of 40 CFR Part 60, Appendix B is feasible.  Multiple Stacks = A fabric filter with a single stack or an electrostatic precipitator with single stack is used.	
GRPFINMILL	40 CFR Part 60, Subpart F	60F	Construction/Modification Date = After June 16, 2008.  BLDS = A bag leak detection system is not being used.  Facility Type = Finish mill system.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Opacity Title 40 Affected Subpart = The affected source subject to this subpart has a different emission limit or requirement for opacity under another regulation in Title 40 of this chapter.	
			Opacity Stringent Limit = NSPS F is the most stringent limit or requirement for opacity.	
			EPA Alternative Requirements = Alternative monitoring requirements are not approved by the EPA administrator.	
			RM/FM Emissions Monitoring System = Daily visible emissions observations.	
GRPFINMILL	40 CFR Part 63, Subpart LLL	63LLL	Major Source = The affected source is located at Portland cement plant that is a major source as defined in 40 CFR § 63.2.	The rule citations were determined from an analysis of
			Alternate Opacity Monitoring = No application has been submitted or approval has not been received for alternate monitoring requirements to demonstrate compliance with the opacity emission standards.	the rule text and the basis of determination
			Facility Type = Raw mill or finish mill	
			Raw/Finish Mill Opacity = Conducting daily visible emissions observations according to 40 CFR § 63.1350(e).	
GRPKILN	40 CFR Part 60,	60F	Construction/Modification Date = After June 16, 2008.	The rule citations were
	Subpart F	part F	NOx Title 40 Affected Subpart = The affected source subject to this subpart has a different emission limit or requirement for NO <sub>x</sub> under another regulation in Title 40 of this chapter.	determined from an analysis of the rule text and the basis of determination
			BLDS = A bag leak detection system is not being used.	dotomination
			Facility Type = Kiln.	
			NOx Stringent Limit = NSPS F is not the most stringent limit or requirement for $NO_x$ .	
			Kiln/Clinker Cooler Combined = The kiln and clinker cooler exhaust are not combined for energy efficiency purposes and sent to a single control device.	
			SO2 Title 40 Affected Subpart = The affected source subject to this subpart has a different emission limit or requirement for $SO_2$ under another regulation in Title 40 of this chapter.	
			SO2 Stringent Limit = NSPS F is not the most stringent limit or requirement for SO <sub>2</sub> .	
			PM Title 40 Affected Subpart = The affected source subject to this subpart has a different emission limit or requirement for PM under another regulation in Title 40 of this chapter.	
			PM Stringent Limit = NSPS F is not the most stringent limit or requirement for PM.	
GRPKILN	40 CFR Part 63,	63LLL	Alkali Bypass = There is no alkali by-pass associated with the kiln or in-line kiln/raw mill.	The rule citations were
	Subpart LLL		Major Source = The affected source is located at Portland cement plant that is a major source as defined in 40 CFR § 63.2.	determined from an analysis of the rule text and the basis of determination
			Performance Test Temperature = Greater than 204° C (400° F).	determination
			Alternate Opacity Monitoring = No application has been submitted or approval has not been received for alternate monitoring requirements to demonstrate compliance with the opacity emission standards.	
			Carbon Injection = Carbon injection is not employed as an emission control technique.	
			Facility Type = In-line kiln/raw mill	
			Burning Hazardous Waste = The kiln or in-line kiln/raw mill does not burn hazardous waste.	
			Control Device = No additional control device is used to comply with the mercury emission limitation.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Alternate Hg Monitoring = No alternate Hg monitoring requirements have been approved.  Monovent = The unit has a control device that does not exhaust through a monovent.  Source Classification = Brownfield source constructed or reconstructed after 12/02/2005.  98% Weight Reduction = Electing to demonstrate compliance with the 20 ppmv concentration limitation for THC.	
			COM Feasibility = The use of a continuous opacity monitor (COM), in accordance with the installation specifications of Performance Specification 1 of 40 CFR Part 60, Appendix B is feasible.  Alternate D/F Monitoring = No alternate D/F monitoring requirements have been approved.  Multiple Stacks = A fabric filter with a single stack or an electrostatic precipitator with single stack is used.  COM = No COM is used.	
GRPKLNFEED	40 CFR Part 60, Subpart F	60F	Construction/Modification Date = After June 16, 2008.  BLDS = A bag leak detection system is not being used.  Facility Type = Conveyor transfer points.  Opacity Title 40 Affected Subpart = The affected source subject to this subpart has a different emission limit or requirement for opacity under another regulation in Title 40 of this chapter.  Opacity Stringent Limit = NSPS F is the most stringent limit or requirement for opacity.  EPA Alternative Requirements = Alternative monitoring requirements are not approved by the EPA administrator.	
GRPKLNFEED	40 CFR Part 63, Subpart LLL	63LLL	Major Source = The affected source is located at Portland cement plant that is a major source as defined in 40 CFR § 63.2.  Alternate Opacity Monitoring = No application has been submitted or approval has not been received for alternate monitoring requirements to demonstrate compliance with the opacity emission standards.  Facility Type = Raw material storage bin, clinker storage bin, finished product storage bin, conveying system transfer point, bagging system, bulk loading system, or bulk unloading system.	The rule citations were determined from an analysis of the rule text and the basis of determination
GRPLOAD	40 CFR Part 60, Subpart F	60F	Construction/Modification Date = After June 16, 2008.  BLDS = A bag leak detection system is not being used.  Facility Type = Loading and unloading systems.  Opacity Title 40 Affected Subpart = The affected source subject to this subpart has a different emission limit or requirement for opacity under another regulation in Title 40 of this chapter.  Opacity Stringent Limit = NSPS F is the most stringent limit or requirement for opacity.  EPA Alternative Requirements = Alternative monitoring requirements are not approved by the EPA administrator.	
GRPLOAD	40 CFR Part 63, Subpart LLL	63LLL	Major Source = The affected source is located at Portland cement plant that is a major source as defined in 40 CFR § 63.2.  Alternate Opacity Monitoring = No application has been submitted or approval has not been received for alternate monitoring requirements to demonstrate compliance with the opacity emission standards.  Facility Type = Raw material storage bin, clinker storage bin, finished product storage bin, conveying	The rule citations were determined from an analysis of the rule text and the basis of determination

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**		
			system transfer point, bagging system, bulk loading system, or bulk unloading system.			
GRPRAWMILL	40 CFR Part 60, Subpart F	60F	Construction/Modification Date = After June 16, 2008.  BLDS = A bag leak detection system is not being used.  Facility Type = Conveyor transfer points.			
			Opacity Title 40 Affected Subpart = The affected source subject to this subpart has a different emission limit or requirement for opacity under another regulation in Title 40 of this chapter.			
			Opacity Stringent Limit = NSPS F is the most stringent limit or requirement for opacity.			
			EPA Alternative Requirements = Alternative monitoring requirements are not approved by the EPA administrator.			
GRPRAWMILL	40 CFR Part 63, Subpart LLL	63LLL	Major Source = The affected source is located at Portland cement plant that is a major source as defined in 40 CFR § 63.2.	The rule citations were determined from an analysis of		
			Alternate Opacity Monitoring = No application has been submitted or approval has not been received for alternate monitoring requirements to demonstrate compliance with the opacity emission standards.	the rule text and the basis of determination		
			Facility Type = Raw material storage bin, clinker storage bin, finished product storage bin, conveying system transfer point, bagging system, bulk loading system, or bulk unloading system.			
GRPRAWSILO	40 CFR Part 60, Subpart F				Construction/Modification Date = On or before August 17, 1971.	
		рап ғ	BLDS = A bag leak detection system is not being used.			
			Facility Type = Raw material storage.	Facility Type = Raw material storage.		
			Opacity Title 40 Affected Subpart = The affected source subject to this subpart has a different emission limit or requirement for opacity under another regulation in Title 40 of this chapter.			
			Opacity Stringent Limit = NSPS F is the most stringent limit or requirement for opacity.			
			EPA Alternative Requirements = Alternative monitoring requirements are not approved by the EPA administrator.			
GRPRAWSILO	40 CFR Part 63, Subpart LLL	63LLL	Major Source = The affected source is located at Portland cement plant that is a major source as defined in 40 CFR § 63.2.	The rule citations were determined from an analysis of		
			Alternate Opacity Monitoring = No application has been submitted or approval has not been received for alternate monitoring requirements to demonstrate compliance with the opacity emission standards.	the rule text and the basis of determination		
			Facility Type = Raw material storage bin, clinker storage bin, finished product storage bin, conveying system transfer point, bagging system, bulk loading system, or bulk unloading system.			
GRPRWSILO2	40 CFR Part 60,	60F	Construction/Modification Date = After June 16, 2008.			
	Subpart F		BLDS = A bag leak detection system is not being used.			
			Facility Type = Raw material storage.			
			Opacity Title 40 Affected Subpart = The affected source subject to this subpart has a different emission limit or requirement for opacity under another regulation in Title 40 of this chapter.			
			Opacity Stringent Limit = NSPS F is the most stringent limit or requirement for opacity.			
			EPA Alternative Requirements = Alternative monitoring requirements are not approved by the EPA			

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			administrator.	
GRPRWSILO2	40 CFR Part 63, Subpart LLL	63LLL	Major Source = The affected source is located at Portland cement plant that is a major source as defined in 40 CFR § 63.2.  Alternate Opacity Monitoring = No application has been submitted or approval has not been received for alternate monitoring requirements to demonstrate compliance with the opacity emission standards.  Facility Type = Raw material storage bin, clinker storage bin, finished product storage bin, conveying system transfer point, bagging system, bulk loading system, or bulk unloading system.	The rule citations were determined from an analysis of the rule text and the basis of determination
GRPSILO	40 CFR Part 60, Subpart F	60F	Construction/Modification Date = After June 16, 2008.  BLDS = A bag leak detection system is not being used.  Facility Type = Finished product storage.  Opacity Title 40 Affected Subpart = The affected source subject to this subpart has a different emission limit or requirement for opacity under another regulation in Title 40 of this chapter.  Opacity Stringent Limit = NSPS F is the most stringent limit or requirement for opacity.  EPA Alternative Requirements = Alternative monitoring requirements are not approved by the EPA administrator.	
GRPSILO	40 CFR Part 63, Subpart LLL	63LLL	Major Source = The affected source is located at Portland cement plant that is a major source as defined in 40 CFR § 63.2.  Alternate Opacity Monitoring = No application has been submitted or approval has not been received for alternate monitoring requirements to demonstrate compliance with the opacity emission standards.  Facility Type = Raw material storage bin, clinker storage bin, finished product storage bin, conveying system transfer point, bagging system, bulk loading system, or bulk unloading system.	The rule citations were determined from an analysis of the rule text and the basis of determination
GRPTRANSFR	40 CFR Part 60, Subpart F	60F	Construction/Modification Date = After June 16, 2008.  BLDS = A bag leak detection system is not being used.  Facility Type = Conveyor transfer points.  Opacity Title 40 Affected Subpart = The affected source subject to this subpart has a different emission limit or requirement for opacity under another regulation in Title 40 of this chapter.  Opacity Stringent Limit = NSPS F is the most stringent limit or requirement for opacity.  EPA Alternative Requirements = Alternative monitoring requirements are not approved by the EPA administrator.	
GRPTRANSFR	40 CFR Part 63, Subpart LLL	63LLL	Major Source = The affected source is located at Portland cement plant that is a major source as defined in 40 CFR § 63.2.  Alternate Opacity Monitoring = No application has been submitted or approval has not been received for alternate monitoring requirements to demonstrate compliance with the opacity emission standards.  Facility Type = Raw material storage bin, clinker storage bin, finished product storage bin, conveying system transfer point, bagging system, bulk loading system, or bulk unloading system.	The rule citations were determined from an analysis of the rule text and the basis of determination
C-31	30 TAC Chapter	R1111	Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
	111, Visible Emissions		Vent Source = The source of the vent is not a steam generator fired by solid fossil fuel, oil or a mixture of oil and gas and is not a catalyst regenerator for a fluid bed catalytic cracking unit.	
			Opacity Monitoring System = A continuous emissions monitoring system (CEMS) capable of measuring the opacity of emissions is installed in the vent in accordance with 30 TAC § 111.111(a)(1)(C).	
			Construction Date = After January 31, 1972	
			Effluent Flow Rate = Effluent flow rate is at least 100,000 actual cubic feet per minute.	
C-32/33A	30 TAC Chapter	R1111	Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113.	
	111, Visible Emissions		Vent Source = The source of the vent is not a steam generator fired by solid fossil fuel, oil or a mixture of oil and gas and is not a catalyst regenerator for a fluid bed catalytic cracking unit.	
			Opacity Monitoring System = A continuous emissions monitoring system (CEMS) capable of measuring the opacity of emissions is installed in the vent in accordance with 30 TAC § 111.111(a)(1)(C).	
			Construction Date = After January 31, 1972	
			Effluent Flow Rate = Effluent flow rate is at least 100,000 actual cubic feet per minute.	
C-36	30 TAC Chapter	R1111	Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113.	
	111, Visible Emissions	vent Source = The source of the vent is not a steam generator fired by	Vent Source = The source of the vent is not a steam generator fired by solid fossil fuel, oil or a mixture of oil and gas and is not a catalyst regenerator for a fluid bed catalytic cracking unit.	
			Opacity Monitoring System = A continuous emissions monitoring system (CEMS) capable of measuring the opacity of emissions is installed in the vent in accordance with 30 TAC § 111.111(a)(1)(C).	
			Construction Date = After January 31, 1972	
			Effluent Flow Rate = Effluent flow rate is at least 100,000 actual cubic feet per minute.	

<sup>\* -</sup> The "unit attributes" or operating conditions that determine what requirements apply

\*\* - Notes changes made to the automated results from the DSS, and a brief explanation why

#### **NSR Versus Title V FOP**

The state of Texas has two Air permitting programs, New Source Review (NSR) and Title V Federal Operating Permits. The two programs are substantially different both in intent and permit content.

NSR is a preconstruction permitting program authorized by the Texas Clean Air Act and Title I of the Federal Clean Air Act (FCAA). The processing of these permits is governed by 30 Texas Administrative Code (TAC) Chapter 116.111. The Title V Federal Operating Program is a federal program authorized under Title V of the FCAA that has been delegated to the state of Texas to administer and is governed by 30 TAC Chapter 122. The major differences between the two permitting programs are listed in the table below:

NSR Permit	Federal Operating Permit(FOP)
Issued Prior to new Construction or modification of an existing facility	For initial permit with application shield, can be issued after operation commences; significant revisions require approval prior to operation.
Authorizes air emissions	Codifies existing applicable requirements, does not authorize new emissions
Ensures issued permits are protective of the environment and human health by conducting a health effects review and that requirement for best available control technology (BACT) is implemented.	Applicable requirements listed in permit are used by the inspectors to ensure proper operation of the site as authorized. Ensures that adequate monitoring is in place to allow compliance determination with the FOP.
Up to two Public notices may be required. Opportunity for public comment and contested case hearings for some authorizations.	One public notice required. Opportunity for public comments. No contested case hearings.
Applies to all point source emissions in the state.	Applies to all major sources and some non-major sources identified by the EPA.
Applies to facilities: a portion of site or individual emission sources	One or multiple FOPs cover the entire site (consists of multiple facilities)
Permits include terms and conditions under which the applicant must construct and operate its various equipment and processes on a facility basis.	Permits include terms and conditions that specify the general operational requirements of the site; and also include codification of all applicable requirements for emission units at the site.
Opportunity for EPA review for Federal Prevention of Significant Deterioration (PSD) and Nonattainment (NA) permits for major sources.	Opportunity for EPA review, Affected states review, and a Public petition period for every FOP.
Permits have a table listing maximum emission limits for pollutants	Permit has an applicable requirements table and Periodic Monitoring (PM) / Compliance Assurance Monitoring (CAM) tables which document applicable monitoring requirements.
Permits can be altered or amended upon application by company. Permits must be issued before construction or modification of facilities can begin.	Permits can be revised through several revision processes, which provide for different levels of public notice and opportunity to comment. Changes that would be significant revisions require that a revised permit be issued before those changes can be operated.
NSR permits are issued independent of FOP requirements.	FOP are independent of NSR permits, but contain a list of all NSR permits incorporated by reference

#### **New Source Review Requirements**

Below is a list of the New Source Review (NSR) permits for the permitted area. These NSR permits are incorporated by reference into the operating permit and are enforceable under it. These permits can be found in the main TCEQ file room,

located on the first floor of Building E, 12100 Park 35 Circle, Austin, Texas. In addition, many of the permits are accessible online through the link provided below. The Public Education Program may be contacted at 1-800-687-4040 or the Air Permits Division (APD) may be contacted at 1-512-239-1250 for help with any question.

Additionally, the site contains emission units that are permitted by rule under the requirements of 30 TAC Chapter 106, Permits by Rule. Registrations submitted by permittees are also available online through the link provided below. The following table specifies the permits by rule that apply to the site.

The status of air permits, applications, and Permits by Rule (PBR) registrations may be found by performing the appropriate search of the databases located at the following website:

www.tceq.texas.gov/permitting/air/nav/air\_status\_permits.html

Details on how to search the databases are available in the **Obtaining Permit Documents** section below.

#### **New Source Review Authorization References**

Prevention of Significant Deterioration (PSD) Permits				
PSD Permit No.: PSDTX1101	Issuance Date: 07/06/2017			
Title 30 TAC Chapter 116 Permits, Special Permits, and Other Authorizations (Other Than Permits By Rule, PSD Permits, or NA Permits) for the Application Area.				
Authorization No.: 122312	Issuance Date: 09/04/2014			
Authorization No.: 49046	Issuance Date: 11/04/2014			
Authorization No.: 5918A	Issuance Date: 05/14/2015			
Authorization No.: 5918B	Issuance Date: 11/04/2014			
Authorization No.: 7681	Issuance Date: 10/31/2014			
Authorization No.: 82775	Issuance Date: 07/06/2017			
Permits By Rule (30 TAC Chapter 106) for the Application Area				
Number: 106.144	Version No./Date: 03/14/1997			
Number: 106.144	Version No./Date: 09/04/2000			
Number: 106.261	Version No./Date: 12/24/1998			
Number: 106.261	Version No./Date: 09/04/2000			
Number: 106.262	Version No./Date: 09/04/2000			
Number: 106.473	Version No./Date: 03/14/1997			
Number: 106.478	Version No./Date: 03/14/1997			
Number: 59	Version No./Date: 10/04/1995			
Number: 118	Version No./Date: 10/04/1995			

#### **Emission Units and Emission Points**

In air permitting terminology, any source capable of generating emissions (for example, an engine or a sandblasting area) is called an Emission Unit. For purposes of Title V, emission units are specifically listed in the operating permit when they have applicable requirements other than New Source Review (NSR), or when they are listed in the permit shield table.

The actual physical location where the emissions enter the atmosphere (for example, an engine stack or a sand-blasting yard) is called an emission point. For New Source Review preconstruction permitting purposes, every emission unit has an associated emission point. Emission limits are listed in an NSR permit, associated with an emission point. This list of emission points and emission limits per pollutant is commonly referred to as the "Maximum Allowable Emission Rate Table", or "MAERT" for short. Specifically, the MAERT lists the Emission Point Number (EPN) that identifies the emission point, followed immediately by the Source Name, identifying the emission unit that is the source of those emissions on this table.

Thus, by reference, an emission unit in a Title V operating permit is linked by reference number to an NSR authorization, and its related emission point.

#### **Monitoring Sufficiency**

Federal and state rules, 40 CFR § 70.6(a)(3)(i)(B) and 30 TAC § 122.142(c) respectively, require that each federal operating permit include additional monitoring for applicable requirements that lack periodic or instrumental monitoring (which may include recordkeeping that serves as monitoring) that yields reliable data from a relevant time period that are representative of the emission unit's compliance with the applicable emission limitation or standard. Furthermore, the federal operating permit must include compliance assurance monitoring (CAM) requirements for emission sources that meet the applicability criteria of 40 CFR Part 64 in accordance with 40 CFR § 70.6(a)(3)(i)(A) and 30 TAC § 122.604(b).

With the exception of any emission units listed in the Periodic Monitoring or CAM Summaries in the FOP, the TCEQ Executive Director has determined that the permit contains sufficient monitoring, testing, recordkeeping, and reporting requirements that assure compliance with the applicable requirements. If applicable, each emission unit that requires additional monitoring in the form of periodic monitoring or CAM is described in further detail under the Rationale for CAM/PM Methods Selected section following this paragraph.

Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected

#### **Periodic Monitoring:**

The Federal Clean Air Act requires that each federal operating permit include monitoring sufficient to assure compliance with the terms and conditions of the permit. Most of the emission limits and standards applicable to emission units at Title V sources include adequate monitoring to show that the units meet the limits and standards. For those requirements that do not include monitoring, or where the monitoring is not sufficient to assure compliance, the federal operating permit must include such monitoring for the emission units affected. The following emission units are subject to periodic monitoring requirements because the emission units are subject to an emission limitation or standard for an air pollutant (or surrogate thereof) in an applicable requirement that does not already require monitoring, or the monitoring for the applicable requirement is not sufficient to assure compliance:

Unit/Group/Process Information				
ID No.: GRPCOAL 1				
Control Device ID No.: N/A	Control Device Type: N/A			
Applicable Regulatory Requirement				
Name: 40 CFR Part 60, Subpart Y	SOP Index No.: 60Y1			
Pollutant: PM (Opacity)	Main Standard: § 60.254(a)			
Monitoring Information				
Indicator: Opacity				
Minimum Frequency: Once per month				
Averaging Period: Six-minutes				
Deviation Limit: Opacity greater than 20%.				

#### Basis of monitoring:

The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Opacity and visible emissions have been used as an indicator of particulate emissions in many federal rules including 40 CFR Part 60, Subpart F and Subpart HH. In addition, use of these indicators is consistent with the EPA's "Compliance Assurance Monitoring (CAM) Technical Guidance Document" (August 1998). Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations and the requirements of 40 CFR § 60.13 for a continuous opacity monitoring system (COMS). The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.

Unit/Group/Process Information				
ID No.: GRPCOAL 2				
Control Device ID No.: N/A	Control Device Type: N/A			
Applicable Regulatory Requirement				
Name: 40 CFR Part 60, Subpart Y	SOP Index No.: 60Y2			
Pollutant: PM (Opacity)	Main Standard: § 60.254(a)			
Monitoring Information				
Indicator: Opacity				
Minimum Frequency: Once per month				
Averaging Period: Six-minutes				
Deviation Limit: Opacity greater than 20%.				

#### Basis of monitoring:

The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Opacity and visible emissions have been used as an indicator of particulate emissions in many federal rules including 40 CFR Part 60, Subpart F and Subpart HH. In addition, use of these indicators is consistent with the EPA's "Compliance Assurance Monitoring (CAM) Technical Guidance Document" (August 1998). Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations and the requirements of 40 CFR § 60.13 for a continuous opacity monitoring system (COMS). The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.

#### **Obtaining Permit Documents**

The New Source Review Authorization References table in the FOP specifies all NSR authorizations that apply at the permit area covered by the FOP. Individual NSR permitting files are located in the TCEQ Central File Room (TCEQ Main Campus located at 12100 Park 35 Circle, Austin, Texas, 78753, Building E, Room 103). They can also be obtained electronically from TCEQ's Central File Room Online (<a href="https://www.tceq.texas.gov/goto/cfr-online">https://www.tceq.texas.gov/goto/cfr-online</a>). Guidance documents that describe how to search electronic records, including Permits by Rule (PBRs) or NSR permits incorporated by reference into an FOP, archived in the Central File Room server are available at <a href="https://www.tceq.texas.gov/permitting/air/nav/air\_status\_permits.html">https://www.tceq.texas.gov/permitting/air/nav/air\_status\_permits.html</a>

All current PBRs are contained in Chapter 106 and can be viewed at the following website:

https://www.tceq.texas.gov/permitting/air/permitbyrule/air\_pbr\_index.html

Previous versions of 30 TAC Chapter 106 PBRs may be viewed at the following website:

www.tceq.texas.gov/permitting/air/permitbyrule/historical rules/old106list/index106.html

Historical Standard Exemption lists may be viewed at the following website:

www.tceq.texas.gov/permitting/air/permitbyrule/historical\_rules/oldselist/se\_index.html

Additional information concerning PBRs is available on the TCEQ website:

https://www.tceq.texas.gov/permitting/air/nav/air pbr.html

## Compliance Review

1. In accordance with 30 TAC Chapter 60, the compliance history was reviewed on <u>June 1, 2017.</u>
Site rating: <u>0.70 / Satisfactory</u> Company rating: <u>0.43 / Satisfactory</u>
(High < 0.10; Satisfactory ≥ 0.10 and ≤ 55; Unsatisfactory > 55)
2. Has the permit changed on the basis of the compliance history or site/company rating?No

#### Site/Permit Area Compliance Status Review

1.	. Were there any out-of-compliance units listed on Form OP-ACPS?	N	Ja
	. Is a compliance plan and schedule included in the permit?		

#### **Available Unit Attribute Forms**

- OP-UA2 Stationary Reciprocating Internal Combustion Engine Attributes
- OP-UA3 Storage Tank/Vessel Attributes
- OP-UA4 Loading/Unloading Operations Attributes
- OP-UA5 Process Heater/Furnace Attributes
- OP-UA6 Boiler/Steam Generator/Steam Generating Unit Attributes
- OP-UA7 Flare Attributes
- **OP-UA8 Coal Preparation Plant Attributes**
- OP-UA9 Nonmetallic Mineral Process Plant Attributes
- OP-UA10 Gas Sweetening/Sulfur Recovery Unit Attributes
- OP-UA11 Stationary Turbine Attributes
- OP-UA12 Fugitive Emission Unit Attributes
- OP-UA13 Industrial Process Cooling Tower Attributes
- **OP-UA14 Water Separator Attributes**
- OP-UA15 Emission Point/Stationary Vent/Distillation Operation/Process Vent Attributes
- OP-UA16 Solvent Degreasing Machine Attributes
- OP-UA17 Distillation Unit Attributes
- OP-UA18 Surface Coating Operations Attributes

- OP-UA19 Wastewater Unit Attributes
- OP-UA20 Asphalt Operations Attributes
- OP-UA21 Grain Elevator Attributes
- OP-UA22 Printing Attributes
- OP-UA24 Wool Fiberglass Insulation Manufacturing Plant Attributes
- OP-UA25 Synthetic Fiber Production Attributes
- OP-UA26 Electroplating and Anodizing Unit Attributes
- OP-UA27 Nitric Acid Manufacturing Attributes
- OP-UA28 Polymer Manufacturing Attributes
- OP-UA29 Glass Manufacturing Unit Attributes
- OP-UA30 Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mill Attributes
- OP-UA31 Lead Smelting Attributes
- OP-UA32 Copper and Zinc Smelting/Brass and Bronze Production Attributes
- OP-UA33 Metallic Mineral Processing Plant Attributes
- OP-UA34 Pharmaceutical Manufacturing
- OP-UA35 Incinerator Attributes
- OP-UA36 Steel Plant Unit Attributes
- OP-UA37 Basic Oxygen Process Furnace Unit Attributes
- OP-UA38 Lead-Acid Battery Manufacturing Plant Attributes
- OP-UA39 Sterilization Source Attributes
- OP-UA40 Ferroalloy Production Facility Attributes
- OP-UA41 Dry Cleaning Facility Attributes
- OP-UA42 Phosphate Fertilizer Manufacturing Attributes
- OP-UA43 Sulfuric Acid Production Attributes
- OP-UA44 Municipal Solid Waste Landfill/Waste Disposal Site Attributes
- OP-UA45 Surface Impoundment Attributes
- OP-UA46 Epoxy Resins and Non-Nylon Polyamides Production Attributes
- OP-UA47 Ship Building and Ship Repair Unit Attributes
- OP-UA48 Air Oxidation Unit Process Attributes
- OP-UA49 Vacuum-Producing System Attributes
- OP-UA50 Fluid Catalytic Cracking Unit Catalyst Regenerator/Fuel Gas Combustion Device/Claus Sulfur Recovery Plant Attributes
- OP-UA51 Dryer/Kiln/Oven Attributes
- OP-UA52 Closed Vent Systems and Control Devices
- OP-UA53 Beryllium Processing Attributes
- OP-UA54 Mercury Chlor-Alkali Cell Attributes
- OP-UA55 Transfer System Attributes
- OP-UA56 Vinyl Chloride Process Attributes
- OP-UA57 Cleaning/Depainting Operation Attributes
- **OP-UA58 Treatment Process Attributes**
- OP-UA59 Coke By-Product Recovery Plant Attributes
- OP-UA60 Chemical Manufacturing Process Unit Attributes
- OP-UA61 Pulp, Paper, or Paperboard Producing Process Attributes
- OP-UA62 Glycol Dehydration Unit Attributes
- OP-UA63 Vegetable Oil Production Attributes